



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



243613

REPLY TO THE ATTENTION OF:

MEMORANDUM

DATE: MAY 19 1992

SUBJECT: Request for a Removal Action at the Park Plating and Metal Finishing facility in Loves Park, Illinois, Winnebago County (Site Spill # PX)

FROM: Ken Theisen, On-Scene Coordinator (OSC)
Thomas C. Basso, OSC/RPM

TO: David A. Ullrich, Director
Waste Management Division

THRU: *for* Norman Niedergang, Associate Division Director
Office of Superfund

I. PURPOSE

The purpose of this memorandum is to request and document approval to expend \$400,139 for a time critical removal action at the Park Plating and Metal Finishing (PPMF) facility in Loves Park, Illinois. This action is necessary to abate the immediate threat to human health and the environment stemming from cyanide-bearing, heavy metal, caustic, and corrosive wastes existing in solid, sludge, and liquid forms. The proposed action seeks to alleviate this threat by removing and disposing of the waste streams.

II. SITE CONDITIONS AND BACKGROUND

A. Site Description

The PPMF site is located at 923 East River Lane in Loves Park, Illinois within a mixed residential/industrial area. The facility covers approximately 0.12 acres, and is owned by John W. Gruner and Gloria Gruner. PPMF is currently an inactive electroplating facility that conducted operations from 1954 to September 1990. The facility plated metal screws and fasteners with substances including, but not limited to zinc, black oxide, and cadmium.

1. Removal site evaluation

The PPMF site operated under two permits issued by the Illinois Environmental Protection Agency (IEPA) Water Pollution Control and Air Pollution Control Divisions, respectively. In the following years, IEPA conducted periodic Compliance Evaluation Inspections (CEI) to ensure compliance with RCRA regulations. On several separate occasions, PPMF was cited for numerous violations for failure to comply with regulations. In September 1988, IEPA approved the closure of four former on-site storage areas. On September 21, 1990, IEPA conducted the last CEI while PPMF was still in operation.

On September 26, 1990, a fire occurred at the PPMF facility which completely destroyed the facility. FIW, Inc. of Pecatonica, Il. was called in to collect sand and dispose of the contaminated run-off water generated by the fire department. Regulatory Compliance Associates, contracted by the owner, placed the building debris into roll-off boxes and emptied the plating lines into drums.

On September 28, 1990, Robert Wengrow of the Illinois Environmental Protection Agency (IEPA) inspected the remains of PPMF and confirmed that the facility had been entirely destroyed.

In the months to follow, a contractor was hired at the expense of the owner to conduct removal actions on-site. The IEPA Emergency Response unit tracked these removal efforts.

On October 8, 1991, the owners alleged that they had no money left to complete the removal action. IEPA documented that hazardous waste material contained in 150 drums and four roll-off boxes as well as 700 gallons of decontamination water had been left on-site.

IEPA pursued legal action against PPMF in the Winnebago County Circuit Court resulting in short-term corrective measures which have temporarily stabilized the containment of hazardous wastes left on-site. The short-term measures included replacement of ripped roll-off tarps; enclosure of over 100 drums within a heated storage shed; fencing of the entire property around the perimeter, and the posting of warning signs every 50 feet.

On February 25, 1992, James Patrick O'Brien of IEPA officially contacted the U.S. EPA Emergency Response Branch to request an investigation of the facility for a potential Fund-lead emergency removal action.

On February 28, 1992, U.S. EPA OSC/RPM Tom Basso and Technical Assistance Team (TAT) members, Bill Sass, Rich Boelter, and Kirstin Elvekrog conducted a site assessment at the facility which included air monitoring and sample collection. The site assessment team confirmed the presence of drums, roll-off boxes, a storage tank, plating vats, and excess debris left from the fire. Over 100 drums were staged inside a heated storage shed; however, the drums did not appear to be properly staged. The drums contained both liquid and solid materials that were found to be hazardous upon testing as described below. The storage shed also contained plating vats, an unidentified gas cylinder and a storage tank supposedly containing 700 gallons of decontamination water. Along the front of the storage shed, approximately 20 to 25, 55-gallon drums had been staged and covered with a tarp. These drums are suspected of containing waste process oil. Just north of the storage shed a pile of debris, drums, and plating process vats had been covered with a tarp. The plating vat was almost full of solid material.

Liquid samples were collected from six drums inside the storage shed. Five of those samples were analyzed for RCRA metals, pH, total cyanide, and reactive cyanide. Analytical results indicate the presence of heavy metals including cadmium (15,000 ppm), chromium (55,000 ppm), zinc (25,000 ppm), and nickel (27 ppm). pH readings ranged from 13.74 to 0.45. Lastly, total and reactive cyanides were found at 600,000 ppm and 21,000 ppm respectively. The sixth sample was a two phase liquid. Field tests on sample #6 showed that the top layer is a flammable an organic constituent.

2. NPL status

This site is presently not on the National Priorities List.

B. Other Actions to Date

The previous removal activities were conducted under IEPA enforcement lead authority. The extent of removal activities were discussed in detail in the above Site Conditions and Background section. As stated previously, IEPA contacted U.S. EPA for assistance since the current owners declared in court that they will not be able to finance the completion of the removal action.

C. State and Local Authorities' Role

1. State and Local Actions to Date

IEPA and Loves Park local authorities' involvement to date has been summarized previously herein. The State and local authorities will provide support in this Fund-lead removal action in a manner that is consistent with containment and cleanup requirements of the NCP.

2. Potential for Continued State/Local Response

The U.S. EPA On-Scene Coordinator has contacted Bob Wengrow of the IEPA who stated that the State agency did not have sufficient funds to conduct removal actions at the Park Plating and Metal Finishing site.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Conditions presently exist at the Park Plating and Metal Finishing site which, if not addressed by implementation of the removal action documented in this Action Memorandum, may pose an imminent and substantial endangerment to the public health or welfare or the environment. The conditions at the site meet the criteria for a removal action as stated in the National Contingency Plan (NCP), 40 C.F.R., Section 300.415 (b) (2). Specifically:

- a. "Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations, animals, or food chain";

Site investigations by U.S. EPA and TAT, and sample analytical data have demonstrated that there are improperly staged and deteriorating drums of hazardous substances at the Park Plating and Metal Finishing site. Cadmium, chromium, nickel, zinc, cyanides, caustics, and corrosives were found in those drums which pose inhalation, ingestion, and contact hazards to the surrounding residents in this mixed residential/industrial area.

- b. "Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release";

Site investigations have identified that over 100 drums contain metal process plating wastes, four roll-off boxes mostly contain solid debris left from the fire, and a storage tank contains approximately 700 gallons of decontamination water. The drums are deteriorating and appear to be improperly staged. Incompatible materials such as acid and cyanide compounds have been stored next to each other. The roll-off boxes are covered by tarps which are subject to ripping and indeed, have already been replaced within the past year due to deterioration.

- c. "Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released";

High winds may eventually cause the tarp covering the roll-off boxes to tear. Indeed, this has already happened in the past. An uncovered roll-off box would release contaminated water during

excessive rain due to leakage. This would possibly contaminate soil and groundwater on PPMF property, as well as on adjacent properties.

d. "Threat of fire or explosion";

Threat of fire or explosion exists inside the storage shed from liquids stored in at least one drum containing a two phase organic/aqueous liquid which TAT had sampled.

IV. ENDANGERMENT DETERMINATION

Given the site conditions, the nature of the hazardous substances on site, and the potential exposure pathways to nearby populations described in Section II and III above, actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTION AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description

The following actions are proposed to alleviate the potential and actual threats to human health and the environment posed by the hazardous contaminants at the site:

a) The contents of vats, drums, tanks, and other containers will be segregated, staged, sampled, and categorized. Compatible waste streams will be bulked and disposed of off-site.

b) Decontamination and removal of all vats and tanks. All decontamination water will be collected and disposed of off-site.

c) An investigation will be made into the extent of possible contamination in the soil of adjacent properties.

Waste transported off-site for disposal will be handled in full compliance with the Agency's off-site policy.

The On-Scene Coordinator has begun planning for provisions of post-removal site control which is consistent with the provisions of Section 300.415 (k) of the National Contingency Plan.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants, or contaminants at the facility which may pose an imminent and substantial endangerment to the public health and safety and to the

environment. These response actions do not impose a burden to affected property disproportionate to the extent to which that contaminated property contributes to the conditions being addressed.

2. Contribution to Remedial Performance

The Park Plating and Metal Finishing is a non-NPL site for which remedial actions have not been planned to date. This removal action addresses all threats meeting the NCP Section 300.415 (b)(2) removal criteria as identified in section III of this Action Memorandum.

3. Applicable or Relevant and Appropriate Requirements (ARARs)

All Federal ARARs and any State ARARs identified in a timely manner for this removal action will be complied with to the extent practicable.

4. Project Schedule

It is estimated that the removal will be completed in fifteen, 12 hour days, with the exception of disposal. It is expected that disposal will be complete well within a one year period.

B. Estimated Costs

The detailed Emergency Response Cleanup Services (ERCS) contractor costs are presented in Attachment A, with the estimated project costs presented below:

EXTRAMURAL COSTS:

Cleanup Contractor Costs	\$241,278
Contingency (15%)	<u>36,191</u>
Subtotal	\$277,469
Total TAT, including multiplier costs	<u>43,030</u>
Extramural Subtotal	\$320,499
Extramural Contingency (15 % of Estimated Subtotal, rounded to nearest thousand)	<u>48,074</u>
TOTAL, EXTRAMURAL COSTS:	\$368,573

INTRAMURAL COSTS:

U.S. EPA Direct Costs [\$30 X (180 Regional Hrs. + 20 HQ Hrs.)]	\$ 6,000
U.S. EPA Indirect Costs (\$53 x # 180 Regional Hrs.)	<u>9,540</u>
TOTAL, INTRAMURAL COSTS:	\$ 15,540
TOTAL REMOVAL PROJECT CEILING	<u>\$384,113</u>

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

The conditions as such at the Metal Finishing and Park Plating site have been temporarily stabilized; however, the potential threat of a release of hazardous plating wastes exists if removal actions are further delayed.

VII. OUTSTANDING POLICY ISSUES

No additional outstanding policy issues remain that have not been previously addressed.

VII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in an Enforcement Confidential addendum.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Park Plating Metal Finishing site, in Loves Park, Illinois, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the site. Conditions at the site meet the NCP section 300.415 (b)(2) criteria for a removal and I recommend your approval of the proposed removal action. The total project ceiling if approved will be \$384,113, of which \$325,543 (\$241,278 + \$36,191 + \$48,074) may be used for the ERCS contractor.

APPROVE :

V. E. Myers (atg)
Director, Waste Management Division

DATE: 5/19/92

DISAPPROVE:

Director, Waste Management Division

DATE: _____

Attachments: A. Detailed Cleanup Contractor Cost Estimate
 B. Enforcement Confidential Information
 C. Index to the Administrative Record

cc: T. Johnson, OS-210
 Sheila Huff, U.S. Department of the Interior
 230 South Dearborn Street, Room 3422
 Chicago, IL 60604
 State Agency Superfund Coordinator

bcc: A. Baumann, 5HS-12
R. Powers/R. Buckley, 5HS-GI
R. Bowden, HSE-J
T. Geishecker, HSE-5J
M. O'Mara, HSE-5J
L. Fabinski, ATSDR, 5HS-11
O. Warnsley, RP/CRU, 5HS-TUB-7
T. Lessor, 5PA-14
F. Myers, SMA-14
EERB Read File
EERB Delivery Order File
EERB Site File
Contracting Officer
K. Theisen, OSC
T. Basso, OSC/RPM
C. Kawakami, Attorney, ORC
C. Graszer, Enforcement Specialist

ATTACHMENT A

ERCS CONTRACTOR COST ESTIMATE BREAKDOWN

Personnel	\$ 67,846
Equipment	43,669
Materials	9,137
Subcontractors	24,548
Waste Transportation	12,145
Waste Disposal	<u>83,933</u>
	\$241,278

ATTACHMENT B

ENFORCEMENT CONFIDENTIAL ADDENDUM

Redacted-information not relevant to the selection of the removal action.

ATTACHMENT C
ADMINISTRATIVE RECORD
FOR
PARK PLATING METAL FINISHING
LOVES PARK, ILLINOIS
DATE TBD

<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
00/00/00	E&E	U.S. EPA	Removal Action Plan	
00/00/00	Theisen, K., Basso, T., U.S. EPA	Ullrich, D., U.S. EPA	Action Memorandum	